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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 WELLS FARGO BANK, NATIONAL  
28 ASSOCIATION, AS TRUSTEE FOR THE  
29 STRUCTURED ADJUSTABLE RATE  
30 MORTGAGE LOAN TRUST, MORTGAGE  
31 PASS-THROUGH CERTIFICATES  
32 SERIES 2005-11,

33 Plaintiff,

34 vs.

35 FIDELITY NATIONAL TITLE GROUP,  
36 INC., et al.,

37 Defendants.

Case No.: 2:21-cv-00383-KJD-EJY

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 6] AND MOTION FOR FEES AND  
COSTS [ECF No. 7]**

**(First Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Wells Fargo  
2 Bank, National Association (“Wells Fargo”) (collectively, the “Parties”), by and through their  
3 counsel of record, hereby stipulate and agree as follows:

- 4 1. On March 5, 2021, Wells Fargo filed its Complaint in the Eighth Judicial District  
5 Court, Case No. A-21-830602-C [ECF No. 1-1];
- 6 2. On March 7, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.  
7 1];
- 8 3. On April. 6, 2021, Wells Fargo filed a Motion for Remand [ECF No. 6] and Motion  
9 for Costs and Fees [ECF No. 7];
- 10 4. Chicago Title’s deadline to respond to Wells Fargo’s Motion for Remand and Motion  
11 for Costs and Fees is April 20, 2021;
- 12 5. Chicago Title’s counsel is requesting an extension until May 20, 2021, to file its  
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Chicago Title requests a brief extension of time to respond to the Motion for Remand  
15 and Motion for Costs and Fees to afford Chicago Title additional time to respond to  
16 the legal arguments set forth in Wells Fargo’s motions;
- 17 7. Wells Fargo does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for  
19 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wells Fargo's  
2 Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended  
3 through and including May 20, 2021.  
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5 Dated: April 19, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6 By: /s/-- Sophia S. Lau  
7 SCOTT E. GIZER  
8 SOPHIA S. LAU  
9 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: April 19, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

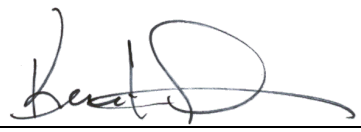
14 Dated: April 19, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff WELLS FARGO  
BANK, NATIONAL ASSOCIATION

18 **IT IS SO ORDERED:**

19  
20 Dated: 4/20/2021

21 By:   
22 UNITED STATES DISTRICT COURT JUDGE  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

